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July 15, 2019

VIA ELECTRONIC FILING

Ms. Marlene H. Dortch, Secretary
Federal Communications Commission
Office of the Secretary
445 12th Street, SW
Washington, DC 20554

Re: *Notice of Ex Parte Meeting*, GN Docket No. 18-122

Dear Ms. Dortch,

Per FCC Rule 1.1206, this letter provides notice that on July 11, 2019, Steve Corda, Vice President Media Platforms, SES Americom, Inc.; Petra Vorwig, Senior Legal & Regulatory Counsel, SES Americom, Inc.; Bronnie Fisher, Technology Team Project Management Lead, C-Band Alliance ("CBA"); and Jennifer Hindin and Henry Gola of Wiley Rein LLP, counsel to the CBA, met with the Commission personnel listed in Attachment A.

At the meeting, Ms. Fisher and Mr. Corda discussed the attached slide presentation, which explains efforts undertaken by the CBA to better understand the earth station data in the FCC's IBFS database. The CBA is analyzing the IBFS data in conjunction with its knowledge of customer operations and other due diligence efforts; the cleansed/verified data suggest that there are about double the number of antennas in the field as are registered in IBFS. The meeting participants also reviewed the process of earth station registrations.

Please contact the undersigned with any questions regarding this letter.

Respectfully submitted,

_____*/s/*
Jennifer Hindin
Counsel for the C-Band Alliance

Attachments

ATTACHMENT A

FCC Personnel:

Paul Blais
Kathleen Campbell
Peter Daronco (phone)
Thomas Derenge (phone)
Jennifer Gilsenan
Kerry Murray
Matthew Pearl (phone)
Paul Powell (phone)
Becky Schwartz

ATTACHMENT B

FCC Presentation on
Registered Earth Station Data Analysis

11-July-2019

C-Band Alliance

Overview

- C-Band Alliance (CBA) supported FCC IBFS registration efforts in Summer/Fall 2018, including filing fee reimbursement
- Since then, CBA has put in significant efforts to gain a better understanding of FCC data to help C-band operators plan to reduce interference from 5G signals
- FCC IBFS data analysis began in July 2018 and is ongoing
  - 2 Full-time data analysts
  - 3 Part-time data analysts
  - 1 database software developer with management support
  - Total of ~5,000 employee hours of data cleansing, categorization and analysis to-date
- Internal CBA database developed for ease-of-use and capturing enhanced/cleansed data

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Deficiencies in FCC IBFS Earth Station Filings

Examples include:

- Registrants did not correctly identify 3700 - 4200 MHz
- Registrants did not correctly enter lat/lons
  - Entirely wrong lat/lon locations
  - A sampling of sites showed that ~5% of the time the filed lat/lons were far from the antenna themselves, but still in view
- Registrants inaccurately stated # of antennas on site
  - Ratio of visually verified antenna to registered antenna = ~2:1
- Some registrants didn't certify or verify their filings making it difficult to determine those still in operation

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CBA Created Enhanced Database

Purpose: Help enable CBA to facilitate the implementation phase protection measures and assist CBA in technical analysis

- Contains only more recent filings (post January 1, 2004)
- Identifies each site with its Partial Economic Area (PEA) indicator
- Identifies each site with its categorization
- Identifies duplicate filings for each site
- Verifies and captures visual number of antenna per site using GIS mapping tools
- Identifies known inactive sites
- Provides additional data for advanced analysis needed for FCC implementation processes

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Example – Atlanta (PEA 11) - Sites

Category	FCC Current/Pending*	Visually Verified Sites*
Cable	101	17
Large Religious Broadcaster	35	35
Radio Broadcaster	35	23
Education	3	2
TV Broadcasters	33	14
Satellite Operators	49	4
Other	16	7
Total	272	102

*Does not include any “closed” filings, such as surrendered, withdrawn, dismissed, etc.

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Example – Atlanta (PEA 11) - Antennas

Category	Total Antenna Filings*	Visually Verified Antenna *	~# of 5G Filters Needed (rounded)**
Cable	140	215	~1,000
Large Religious Broadcaster	35	35	~70
Radio Broadcaster	31	76	~150
Education	3	5	~10
TV Broadcasters	69	120	~250
Satellite Operators	72	143	~400
Other	15	20	~50
Total	326	614	1,930

*Does not include any antenna from “closed” filings, such as surrendered, withdrawn, dismissed, etc.

**Assumes some dual or triple-feed antenna

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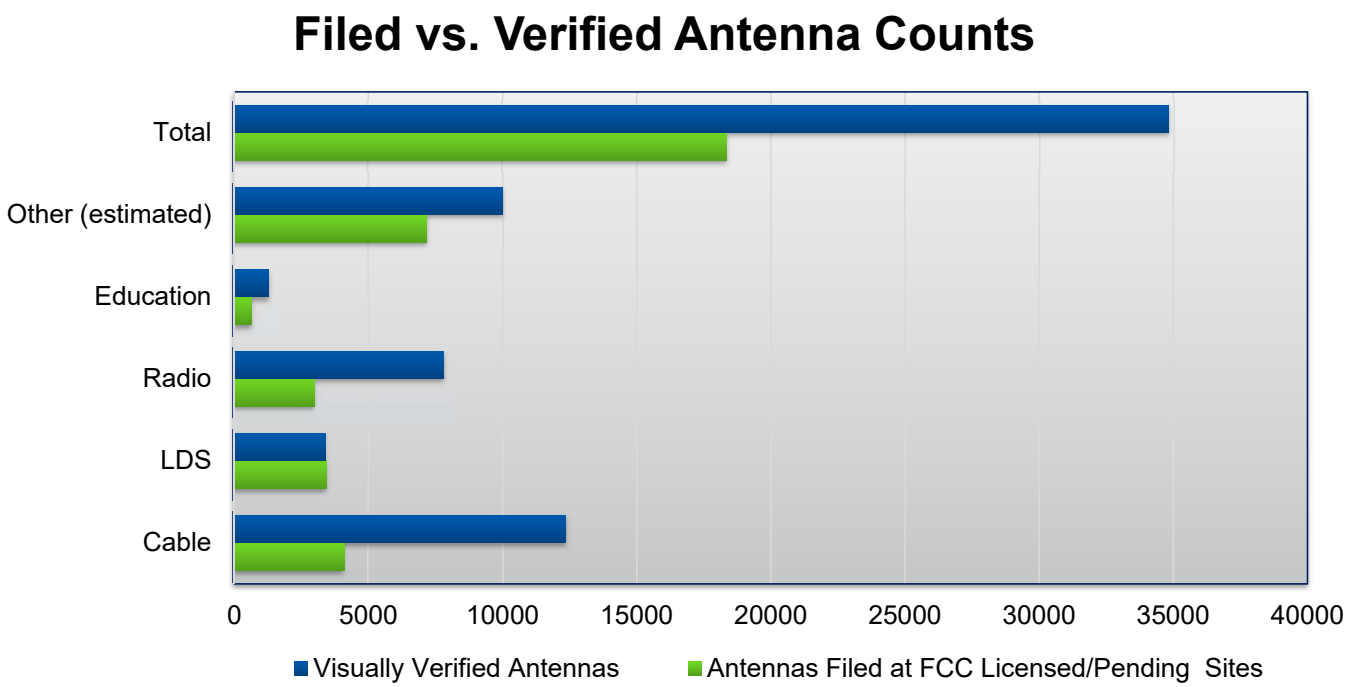
Antenna Verification Findings



- Visual searches using earth imaging software have been performed for ~70% of the registrations in IBFS
- Findings indicate that there are about double the number of antennas in the field as there are registered in FCC Licensed or Pending Sites

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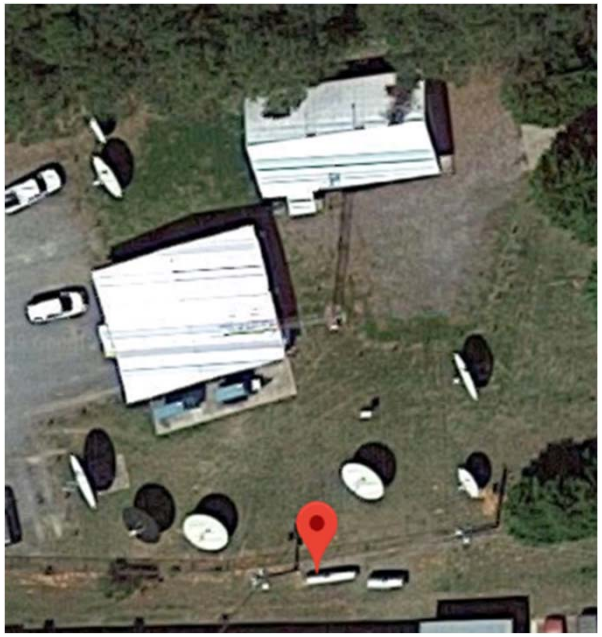
Antenna counts – Example 1



E) Antenna Facilites

Site ID	Antenna ID	Units	Diameter (Meters)	Manufacturer	Model Number	Site Elevation	Max Antenna Height (Meters)	Special Provisions (Refer to Section H)
1	1	1	5.0	ANIXTER-MARK		452.6	5.6 AGL/ 458.2 AMSL	

Antennas observed:
7 C-band/ 8 total
Antennas registered on my IBFS website: 1

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Antenna counts – Example 2

ANTENNA

Site ID	E28. Antenna Id	E29. Quantity	E30. Manufacturer	E31. Model	E32. Antenna Size<meters>	E41/42. Antenna GainTransmint and/or Recieve (____dBi at _____GHz)
Site 1	ANT1	1	Scientific Atlanta	8005	4.6	43.5 dBi at 4.0000

Antennas observed:
7 C-band/10 total
Antennas registered on my IBFS website: 1

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Antenna Optimization – Example 3

Total Distance of Lat/Lon Filed to Antenna Site = 268 Meters/ 879 Feet

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